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6 Attorneys for Complainant

8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

11 In the Matter of the Petition to Revoke Probation  
Against:

Case No. 2005-12

12 PAIGE MARIE CAMPBELL  
13 2017 N. Morengo Ave.  
Pasadena, CA 91103  
14 Registered Nurse License No. 582195

**PETITION TO REVOKE  
PROBATION**

15 Respondent.

16  
17 Complainant alleges:

18 **PARTIES**

19 1. Ruth Ann Terry, M.P.H, R.N (Complainant) brings this Petition to Revoke  
20 Probation solely in her official capacity as the Executive Officer of the Board of Registered  
21 Nursing, Department of Consumer Affairs.

22 2. On or about June 19, 2001, the Board of Registered Nursing (Board)  
23 issued Registered Nurse License Number 582195 to Paige Marie Campbell (Respondent). The  
24 Registered Nurse License was in full force and effect at all times relevant to the charges brought  
25 herein and will expire on October 31, 2008, unless renewed.

26 3. On May 18, 2005, pursuant to the Stipulated Settlement and Disciplinary  
27 Order adopted by the Board of Registered Nursing in the disciplinary action titled *In the Matter*  
28 *of the Accusation Against Paige Marie Campbell*, Case No. 2005-12, the Board revoked

1 Respondent's Registered Nurse License effective June 17, 2005. The revocation was stayed and  
2 Respondent's license was placed on probation for a period of three (3) years with certain terms  
3 and conditions. A copy of that decision is attached as Exhibit A and is incorporated by reference.

#### 4 JURISDICTION

5 4. This Petition to Revoke Probation is brought before the Board of  
6 Registered Nursing, Department of Consumer Affairs, under the authority of the following laws.  
7 All section references are to the Business and Professions Code unless otherwise indicated.

#### 8 STATUTORY PROVISIONS

9 5. Section 2750 of the Business and Professions Code (Code) provides, in  
10 relevant part, that the Board may discipline any licensee, including a licensee holding a  
11 temporary or an inactive license, for any reason provided in Article 3 (commencing with section  
12 2750) of the Nursing Practice Act.

13 6. Section 2764 of the Code provides, in pertinent part, that the expiration of  
14 a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding  
15 against the licensee or to render a decision imposing discipline on the license. Under section  
16 2811(b) of the Code, the Board may renew an expired license at any time within eight years after  
17 the expiration.

#### 18 FIRST CAUSE TO REVOKE PROBATION

19 (Comply with the Board's Probation Program)

20 7. At all times after the effective date of Respondent's probation, Probation  
21 Condition Number 2 stated:

22 Respondent shall fully comply with the conditions of the Probation Program  
23 established by the Board and cooperate with representatives of the Board in its  
24 monitoring and investigation of the Respondent's compliance with the Board's  
25 Probation Program. Respondent shall inform the Board in writing within no more  
26 than 15 days of any address change and shall at all times maintain an active,  
27 current license status with the Board, including during any period of suspension.  
28 Upon successful completion of probation, Respondent's license shall be fully  
restored.

27 ///

28 ///

8. Respondent's probation is subject to revocation because she failed to comply with Probation Condition Number 16, referenced below, in that she failed to abstain from the use of alcohol.

### **SECOND CAUSE TO REVOKE PROBATION**

(Abstain from Use of Psychotropic (Mood-Altering) Drugs)

9. At all times after the effective date of Respondent's probation, Probation Condition Number 16 stated:

Respondent shall completely abstain from the possession, injection or consumption by any route of all psychotropic (mood altering) drugs, including alcohol, except when the same are ordered by a health care professional legally authorized to do so as part of documented medical treatment. Respondent shall have sent to the Board, in writing and within fourteen (14) days, by the prescribing health professional, a report identifying the medication, dosage, the date the medication was prescribed, the Respondent's prognosis, the date the medication will no longer be required, and the effect on the recovery plan, if appropriate.

Respondent shall identify for the Board a single physician, nurse practitioner or physician assistant who shall be aware of Respondent's history of substance abuse and will coordinate and monitor any prescriptions for Respondent for dangerous drugs, controlled substances or mood-altering drugs. The coordinating physician, nurse practitioner, or physician assistant shall report to the Board on a quarterly basis Respondent's compliance with this condition including her ability to practice safely. If any substances considered addictive have been prescribed, the report shall identify a program for the time limited use of any such substances. The Board may require the single coordinating physician, nurse practitioner, or physician assistant to be a specialist in addictive medicine, or to consult with a specialist in addictive medicine.

10. Respondent's probation is subject to revocation because she failed to comply with Probation Condition Number 16, referenced above, in that she failed to abstain from the use of alcohol. The facts and circumstances regarding this violation are that on or about April 5, 2007, June 5, 2007, July 24, 2007, and September 4, 2007, the Respondent tested positive for alcohol.

### **PRAYER**

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

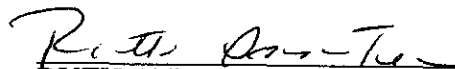
1. Revoking the probation that was granted by the Board in Board of Registered Nursing Case No. 2005-12, OAH Case No. L2004080365, and imposing the

1 disciplinary order that was stayed, thereby revoking Registered Nurse License No. 582195 issued  
2 to Paige Marie Campbell;

3                   2.       Revoking or suspending Registered Nurse License No. 582195, issued to  
4 Paige Marie Campbell; and,

5                   3.       Taking such other and further action as deemed necessary and proper.  
6

7 DATED: 3/11/08  
8

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10   
11 RUTH ANN TERRY, M.P.H., R.N.  
12 Executive Officer  
13 Board of Registered Nursing  
14 Department of Consumer Affairs  
15 State of California  
16 Complainant

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**Exhibit A**

**Decision and Order**

**Board of Registered Nursing Case No. 2005-12, OAH Case No. L2004080365**

BEFORE THE  
BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

PAIGE MARIE CAMPBELL  
911 MONTEREY AVENUE, # 12  
MONROVIA, CA 91016

Case No. 2005-12

Registered Nurse License No. 582195

Respondent

**DECISION AND ORDER**

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as it's Decision in the above entitled matter.

This Decision shall become effective on June 17, 2005.

IT IS SO ORDERED May 18, 2005.

*Sandra R. Erickson*

President  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California

1 BILL LOCKYER, Attorney General  
2 of the State of California  
3 GREGORY J. SALUTE, State Bar No. 164015  
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10 Attorneys for Complainant

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**BEFORE THE  
BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

PAIGE MARIE CAMPBELL

Respondent.

Case No. 2005-12

OAH No. L2004080365

**STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER**

IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-entitled proceedings that the following matters are true:

**PARTIES**

1. Ruth Ann Terry, M.P.H., R.N. (Complainant) is the Executive Officer of the Board of Registered Nursing. She brought this action solely in her official capacity and is represented in this matter by Bill Lockyer, Attorney General of the State of California, by Gregory J. Salute, Deputy Attorney General.

2. Respondent Paige Marie Campbell (Respondent) is represented in this proceeding by attorney A. Steven Frankel, Esq., whose address is 3527 Mt. Diablo Blvd., #269, Lafayette, Ca. 94549.

3. On or about June 19, 2001, the Board of Registered Nursing issued Registered Nurse License No. 582195 to Respondent Paige Marie Campbell. The license will expire on October 31, 2006, unless renewed.

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**1**



1 disciplinary action.

2 CONTINGENCY

3 11. This stipulation shall be subject to approval by the Board of Registered  
4 Nursing. Respondent understands and agrees that counsel for Complainant and the staff of the  
5 Board of Registered Nursing may communicate directly with the Board regarding this stipulation  
6 and settlement, without notice to or participation by Respondent or her counsel. By signing the  
7 stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek  
8 to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails  
9 to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary  
10 Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal  
11 action between the parties, and the Board shall not be disqualified from further action by having  
12 considered this matter.

13 12. The parties understand and agree that facsimile copies of this Stipulated  
14 Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same  
15 force and effect as the originals.

16 13. In consideration of the foregoing admissions and stipulations, the parties  
17 agree that the Board may, without further notice or formal proceeding, issue and enter the  
18 following Disciplinary Order:

19 DISCIPLINARY ORDER

20 IT IS HEREBY ORDERED that registered nurse license No. 582195 issued to  
21 Respondent Paige Marie Campbell is revoked. However, the revocation is stayed and  
22 Respondent is placed on probation for three (3) years on the following terms and conditions.

23 **Severability Clause.** Each condition of probation contained herein is a separate  
24 and distinct condition. If any condition of this Order, or any application thereof, is declared  
25 unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other  
26 applications thereof, shall not be affected. Each condition of this Order shall separately be valid  
27 and enforceable to the fullest extent permitted by law.

28 1. **Obey All Laws.** Respondent shall obey all federal, state and local laws.

1 A full and detailed account of any and all violations of law shall be reported by Respondent to  
2 the Board in writing within seventy-two (72) hours of occurrence. To permit monitoring of  
3 compliance with this condition, Respondent shall submit completed fingerprint forms and  
4 fingerprint fees within 45 days of the effective date of the decision, unless previously submitted  
5 as part of the licensure application process.

6 **Criminal Court Orders:** If Respondent is under criminal court orders, including  
7 probation or parole, and the order is violated, this shall be deemed a violation of these probation  
8 conditions, and may result in the filing of an accusation and/or petition to revoke probation.

9 2. **Comply with the Board's Probation Program.** Respondent shall fully  
10 comply with the conditions of the Probation Program established by the Board and cooperate  
11 with representatives of the Board in its monitoring and investigation of the Respondent's  
12 compliance with the Board's Probation Program. Respondent shall inform the Board in writing  
13 within no more than 15 days of any address change and shall at all times maintain an active,  
14 current license status with the Board, including during any period of suspension.

15 Upon successful completion of probation, Respondent's license shall be fully  
16 restored.

17 3. **Report in Person.** Respondent, during the period of probation, shall  
18 appear in person at interviews/meetings as directed by the Board or its designated  
19 representatives.

20 4. **Residency, Practice, or Licensure Outside of State.** Periods of  
21 residency or practice as a registered nurse outside of California shall not apply toward a reduction  
22 of this probation time period. Respondent's probation is tolled, if and when Respondent resides  
23 outside of California. Respondent must provide written notice to the Board within 15 days of any  
24 change of residency or practice outside the state, and within 30 days prior to re-establishing  
25 residency or returning to practice in this state.

26 Respondent shall provide a list of all states and territories where she has ever been  
27 licensed as a registered nurse, vocational nurse, or practical nurse. Respondent shall further  
28 provide information regarding the status of each license and any changes in such license status

1 during the term of probation. Respondent shall inform the Board if she applies for or obtains a  
2 new nursing license during the term of probation.

3           **5. Submit Written Reports.** Respondent, during the period of probation,  
4 shall submit or cause to be submitted such written reports/declarations and verification of actions  
5 under penalty of perjury, as required by the Board. These reports/declarations shall contain  
6 statements relative to Respondent's compliance with all the conditions of the Board's Probation  
7 Program. Respondent shall immediately execute all release of information forms as may be  
8 required by the Board or its representatives.

9           Respondent shall provide a copy of this Decision to the nursing regulatory agency  
10 in every state and territory in which she has a registered nurse license.

11           **6. Function as a Registered Nurse.** Respondent, during the period of  
12 probation, shall engage in the practice of registered nursing in California for a minimum of 24  
13 hours per week for 6 consecutive months or as determined by the Board.

14           For purposes of compliance with the section, "engage in the practice of registered  
15 nursing" may include, when approved by the Board, volunteer work as a registered nurse, or  
16 work in any non-direct patient care position that requires licensure as a registered nurse.

17           The Board may require that advanced practice nurses engage in advanced practice  
18 nursing for a minimum of 24 hours per week for 6 consecutive months or as determined by the  
19 Board.

20           If Respondent has not complied with this condition during the probationary term,  
21 and Respondent has presented sufficient documentation of her good faith efforts to comply with  
22 this condition, and if no other conditions have been violated, the Board, in its discretion, may  
23 grant an extension of Respondent's probation period up to one year without further hearing in  
24 order to comply with this condition. During the one year extension, all original conditions of  
25 probation shall apply.

26           **7. Employment Approval and Reporting Requirements.** Respondent  
27 shall obtain prior approval from the Board before commencing or continuing any employment,  
28 paid or voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all

1 performance evaluations and other employment related reports as a registered nurse upon request  
2 of the Board.

3 Respondent shall provide a copy of this Decision to her employer and immediate  
4 supervisors prior to commencement of any nursing or other health care related employment.

5 In addition to the above, Respondent shall notify the Board in writing within  
6 seventy-two (72) hours after she obtains any nursing or other health care related employment.

7 Respondent shall notify the Board in writing within seventy-two (72) hours after she is  
8 terminated or separated, regardless of cause, from any nursing, or other health care related  
9 employment with a full explanation of the circumstances surrounding the termination or  
10 separation.

11 **8. Supervision.** Respondent shall obtain prior approval from the Board  
12 regarding Respondent's level of supervision and/or collaboration before commencing or  
13 continuing any employment as a registered nurse, or education and training that includes patient  
14 care.

15 Respondent shall practice only under the direct supervision of a registered nurse  
16 in good standing (no current discipline) with the Board of Registered Nursing, unless alternative  
17 methods of supervision and/or collaboration (e.g., with an advanced practice nurse or physician)  
18 are approved.

19 Respondent's level of supervision and/or collaboration may include, but is not  
20 limited to the following:

21 (a) Maximum - The individual providing supervision and/or collaboration is  
22 present in the patient care area or in any other work setting at all times.

23 (b) Moderate - The individual providing supervision and/or collaboration is in  
24 the patient care unit or in any other work setting at least half the hours Respondent works.

25 (c) Minimum - The individual providing supervision and/or collaboration has  
26 person-to-person communication with Respondent at least twice during each shift worked.

27 (d) Home Health Care - If Respondent is approved to work in the home health  
28 care setting, the individual providing supervision and/or collaboration shall have person-to-

1 person communication with Respondent as required by the Board each work day. Respondent  
2 shall maintain telephone or other telecommunication contact with the individual providing  
3 supervision and/or collaboration as required by the Board during each work day. The individual  
4 providing supervision and/or collaboration shall conduct, as required by the Board, periodic, on-  
5 site visits to patients' homes visited by Respondent with or without Respondent present.

6           **9. Employment Limitations.** Respondent shall not work for a nurse's  
7 registry, in any private duty position as a registered nurse, a temporary nurse placement agency, a  
8 traveling nurse, or for an in-house nursing pool.

9           Respondent shall not work for a licensed home health agency as a visiting nurse  
10 unless the registered nursing supervision and other protections for home visits have been  
11 approved by the Board. Respondent shall not work in any other registered nursing occupation  
12 where home visits are required.

13           Respondent shall not work in any health care setting as a supervisor of registered  
14 nurses. The Board may additionally restrict Respondent from supervising licensed vocational  
15 nurses and/or unlicensed assistive personnel on a case-by-case basis.

16           Respondent shall not work as a faculty member in an approved school of nursing  
17 or as an instructor in a Board approved continuing education program.

18           Respondent shall work only on a regularly assigned, identified and predetermined  
19 worksite(s) and shall not work in a float capacity.

20           If Respondent is working or intends to work in excess of 40 hours per week, the  
21 Board may request documentation to determine whether there should be restrictions on the hours  
22 of work.

23           **10. Complete a Nursing Course(s).** Respondent, at her own expense, shall  
24 enroll and successfully complete a course(s) relevant to the practice of registered nursing no later  
25 than six months prior to the end of her probationary term.

26           Respondent shall obtain prior approval from the Board before enrolling in the  
27 course(s). Respondent shall submit to the Board the original transcripts or certificates of  
28 completion for the above required course(s). The Board shall return the original documents to

1 Respondent after photocopying them for its records.

2           11.     **Cost Recovery.** Respondent shall pay to the Board costs associated with  
3 its investigation and enforcement pursuant to Business and Professions Code section 125.3 in the  
4 amount of \$1000.00. Respondent shall be permitted to pay these costs in a payment plan  
5 approved by the Board, with payments to be completed no later than three months prior to the  
6 end of the probation term.

7           If Respondent has not complied with this condition during the probationary term,  
8 and Respondent has presented sufficient documentation of her good faith efforts to comply with  
9 this condition, and if no other conditions have been violated, the Board, in its discretion, may  
10 grant an extension of Respondent's probation period up to one year without further hearing in  
11 order to comply with this condition. During the one year extension, all original conditions of  
12 probation will apply.

13           12.     **Violation of Probation.** If Respondent violates the conditions of her  
14 probation, the Board after giving Respondent notice and an opportunity to be heard, may set  
15 aside the stay order and impose the stayed discipline (revocation/suspension) of Respondent's  
16 license.

17           If during the period of probation, an accusation or petition to revoke probation has  
18 been filed against Respondent's license or the Attorney General's Office has been requested to  
19 prepare an accusation or petition to revoke probation against Respondent's license, the  
20 probationary period shall automatically be extended and shall not expire until the accusation or  
21 petition has been acted upon by the Board.

22           13.     **License Surrender.** During Respondent's term of probation, if she ceases  
23 practicing due to retirement, health reasons or is otherwise unable to satisfy the conditions of  
24 probation, Respondent may surrender her license to the Board. The Board reserves the right to  
25 evaluate Respondent's request and to exercise its discretion whether to grant the request, or to  
26 take any other action deemed appropriate and reasonable under the circumstances, without  
27 further hearing. Upon formal acceptance of the tendered license and wall certificate, Respondent  
28 will no longer be subject to the conditions of probation.

1 Surrender of Respondent's license shall be considered a disciplinary action and  
2 shall become a part of Respondent's license history with the Board. A registered nurse whose  
3 license has been surrendered may petition the Board for reinstatement no sooner than the  
4 following minimum periods from the effective date of the disciplinary decision:

5 (1) Two years for reinstatement of a license that was surrendered for any  
6 reason other than a mental or physical illness; or

7 (2) One year for a license surrendered for a mental or physical illness.

8 14. **Physical Examination.** Within 90 days of the effective date of this  
9 Decision, Respondent, at her own expense, shall have a licensed physician, nurse practitioner, or  
10 physician assistant, who is approved by the Board before the assessment is performed, submit an  
11 assessment of the Respondent's physical condition and capability to perform the duties of a  
12 registered nurse. Such an assessment shall be submitted in a format acceptable to the Board. If  
13 medically determined, a recommended treatment program will be instituted and followed by the  
14 Respondent with the physician, nurse practitioner, or physician assistant providing written  
15 reports to the Board on forms provided by the Board.

16 If Respondent is determined to be unable to practice safely as a registered nurse,  
17 the licensed physician, nurse practitioner, or physician assistant making this determination shall  
18 immediately notify the Board and Respondent by telephone, and the Board shall request that the  
19 Attorney General's office prepare an accusation or petition to revoke probation. Respondent  
20 shall immediately cease practice and shall not resume practice until notified by the Board.  
21 During this period of suspension, Respondent shall not engage in any practice for which a license  
22 issued by the Board is required until the Board has notified Respondent that a medical  
23 determination permits Respondent to resume practice. This period of suspension will not apply  
24 to the reduction of this probationary time period.

25 If Respondent fails to have the above assessment submitted to the Board within  
26 the 90-day requirement, Respondent shall immediately cease practice and shall not resume  
27 practice until notified by the Board. This period of suspension will not apply to the reduction of  
28 this probationary time period. The Board may waive or postpone this suspension only if

1 significant, documented evidence of mitigation is provided. Such evidence must establish good  
2 faith efforts by Respondent to obtain the assessment, and a specific date for compliance must be  
3 provided. Only one such waiver or extension may be permitted.

4           **15. Participate in Treatment/Rehabilitation Program for Chemical**  
5 **Dependence.** Respondent, at her own expense, shall successfully complete during the  
6 probationary period or shall have successfully completed prior to commencement of probation a  
7 Board-approved treatment/rehabilitation program of at least six months duration. As required,  
8 reports shall be submitted by the program on forms provided by the Board. If Respondent has  
9 not completed a Board-approved treatment/rehabilitation program prior to commencement of  
10 probation, Respondent, within 45 days from the effective date of the decision, shall be enrolled in  
11 a program. If a program is not successfully completed within the first nine months of probation,  
12 the Board shall consider Respondent in violation of probation.

13           Based on Board recommendation, each week Respondent shall be required to  
14 attend at least one, but no more than five 12-step recovery meetings or equivalent (e.g., Narcotics  
15 Anonymous, Alcoholics Anonymous, etc.) and a nurse support group as approved and directed  
16 by the Board. If a nurse support group is not available, an additional 12-step meeting or  
17 equivalent shall be added. Respondent shall submit dated and signed documentation confirming  
18 such attendance to the Board during the entire period of probation. Respondent shall continue  
19 with the recovery plan recommended by the treatment/rehabilitation program or a licensed  
20 mental health examiner and/or other ongoing recovery groups.

21           **16. Abstain from Use of Psychotropic (Mood-Altering) Drugs.** Respondent  
22 shall completely abstain from the possession, injection or consumption by any route of all  
23 psychotropic (mood altering) drugs, including alcohol, except when the same are ordered by a  
24 health care professional legally authorized to do so as part of documented medical treatment.  
25 Respondent shall have sent to the Board, in writing and within fourteen (14) days, by the  
26 prescribing health professional, a report identifying the medication, dosage, the date the  
27 medication was prescribed, the Respondent's prognosis, the date the medication will no longer  
28 be required, and the effect on the recovery plan, if appropriate.



1                    Respondent shall identify for the Board a single physician, nurse practitioner or  
2 physician assistant who shall be aware of Respondent's history of substance abuse and will  
3 coordinate and monitor any prescriptions for Respondent for dangerous drugs, controlled  
4 substances or mood-altering drugs. The coordinating physician, nurse practitioner, or physician  
5 assistant shall report to the Board on a quarterly basis Respondent's compliance with this  
6 condition including her ability to practice safely. If any substances considered addictive have  
7 been prescribed, the report shall identify a program for the time limited use of any such  
8 substances.

9                    The Board may require the single coordinating physician, nurse practitioner, or  
10 physician assistant to be a specialist in addictive medicine, or to consult with a specialist in  
11 addictive medicine.

12                    17.     **Submit to Tests and Samples.** Respondent, at her own expense, shall  
13 participate in a random, biological fluid testing or a drug screening program which the Board  
14 approves. The length of time and frequency will be subject to approval by the Board.  
15 Respondent is responsible for keeping the Board informed of Respondent's current telephone  
16 number at all times. Respondent shall also ensure that messages may be left at the telephone  
17 number when she is not available and ensure that reports are submitted directly by the testing  
18 agency to the Board, as directed. Any confirmed positive finding shall be reported immediately  
19 to the Board by the program and Respondent shall be considered in violation of probation.

20                    In addition, Respondent, at any time during the period of probation, shall fully  
21 cooperate with the Board or any of its representatives, and shall, when requested, submit to such  
22 tests and samples as the Board or its representatives may require for the detection of alcohol,  
23 narcotics, hypnotics, dangerous drugs, or other controlled substances.

24                    If Respondent has a positive drug screen for any substance not legally authorized  
25 and not reported to the coordinating physician, nurse practitioner, or physician assistant,  
26 Respondent shall immediately cease practice and shall not resume practice until notified by the  
27 Board. Further, if Respondent has a positive drug screen for any substance not legally authorized  
28 and not reported to the coordinating physician, nurse practitioner, or physician assistant, and the

1 Board files a petition to revoke probation or an accusation, the Board may suspend Respondent  
2 from practice pending the final decision on the petition to revoke probation or the accusation.  
3 This period of suspension will not apply to the reduction of this probationary time period.

4 If Respondent fails to participate in a random, biological fluid testing or drug  
5 screening program within the specified time frame, Respondent shall immediately cease practice  
6 and shall not resume practice until notified by the Board. After taking into account documented  
7 evidence of mitigation, if the Board files a petition to revoke probation or an accusation, the  
8 Board may suspend Respondent from practice pending the final decision on the petition to  
9 revoke probation or the accusation. This period of suspension will not apply to the reduction of  
10 this probationary time period.

11 18. **Mental Health Examination.** Respondent shall, within 45 days of the  
12 effective date of this Decision, have a mental health examination including psychological testing  
13 as appropriate to determine her capability to perform the duties of a registered nurse. The  
14 examination will be performed by a psychiatrist, psychologist or other licensed mental health  
15 practitioner approved by the Board. The examining mental health practitioner will submit a  
16 written report of that assessment and recommendations to the Board. All costs are the  
17 responsibility of Respondent. Recommendations for treatment, therapy or counseling made as a  
18 result of the mental health examination will be instituted and followed by Respondent.

19 If Respondent is determined to be unable to practice safely as a registered nurse,  
20 the licensed mental health care practitioner making this determination shall immediately notify  
21 the Board and Respondent by telephone, and the Board shall request that the Attorney General's  
22 office prepare an accusation or petition to revoke probation. Respondent shall immediately cease  
23 practice and may not resume practice until notified by the Board. During this period of  
24 suspension, Respondent shall not engage in any practice for which a license issued by the Board  
25 is required, until the Board has notified Respondent that a mental health determination permits  
26 Respondent to resume practice. This period of suspension will not apply to the reduction of this  
27 probationary time period.

28 If Respondent fails to have the above assessment submitted to the Board within

1 the 45-day requirement, Respondent shall immediately cease practice and shall not resume  
2 practice until notified by the Board. This period of suspension will not apply to the reduction of  
3 this probationary time period. The Board may waive or postpone this suspension only if  
4 significant, documented evidence of mitigation is provided. Such evidence must establish good  
5 faith efforts by Respondent to obtain the assessment, and a specific date for compliance must be  
6 provided. Only one such waiver or extension may be permitted.

7           19.     **Therapy or Counseling Program.** Respondent, at her own expense, shall  
8 participate and/or continue in an on-going counseling program until such time as the Board  
9 releases Respondent from this requirement and only upon the recommendation of the counselor.  
10 Written progress reports from the counselor will be required at various intervals.

11                                   ACCEPTANCE

12           I have carefully read the above Stipulated Settlement and Disciplinary Order and  
13 have fully discussed it with my attorney, A. Steven Frankel, Esq. I understand the stipulation and  
14 the effect it will have on my registered nurse license. I enter into this Stipulated Settlement and  
15 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the  
16 Decision and Order of the Board of Registered Nursing.

17 DATED: 1/24/06

18  
19                                   *Paige Marie Campbell*  
20                                   PAIGE MARIE CAMPBELL  
21                                   Respondent  
22  
23  
24  
25  
26  
27  
28

1 I have read and fully discussed with Respondent Paige Marie Campbell the terms  
2 and conditions and other matters contained in the above Stipulated Settlement and Disciplinary  
3 Order. I approve its form and content.

4 DATED: January 6, 2005.

5  
6   
7 A. STEVEN FRANKEL  
Attorney for Respondent

8  
9  
10  
11 ENDORSEMENT

12 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully  
13 submitted for consideration by the Board of Registered Nursing of the Department of Consumer  
14 Affairs.

15  
16 DATED: 2/2/05.

17 BILL LOCKYER, Attorney General  
18 of the State of California

19   
20 GREGORY J. SALUTE  
21 Deputy Attorney General

22 Attorneys for Complainant

23 DOJ Docket/Matter ID Number: 2004800623  
24 Campbell Stip.wpd  
25  
26  
27  
28

**Exhibit A**  
**Accusation No. 2005-12**

1 BILL LOCKYER, Attorney General  
of the State of California  
2 GREGORY J. SALUTE, State Bar No. 164015  
Deputy Attorney General  
3 California Department of Justice  
300 So. Spring Street, Suite 1702  
4 Los Angeles, CA 90013  
Telephone: (213) 897-2520  
5 Facsimile: (213) 897-2804

6 Attorneys for Complainant

7  
8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. *2005-12*

12 PAIGE MARIE CAMPBELL  
911 Monterey Avenue, #8  
13 Monrovia, CA 91016

**A C C U S A T I O N**

14 Registered Nurse License No. 582195

15 Respondent.

16  
17 Complainant alleges:

18 **PARTIES**

19 1. Ruth Ann Terry, M.P.H., R.N. (Complainant) brings this Accusation  
20 solely in her official capacity as the Executive Officer of the Board of Registered Nursing  
21 (Board), Department of Consumer Affairs.

22 2. On or about June 19, 2001, the Board issued Registered Nurse License  
23 No. 582195 to Paige Marie Campbell (Respondent). The license was in full force and effect at  
24 all times relevant to the charges brought herein and will expire on October 31, 2004, unless  
25 renewed.

26 **JURISDICTION**

27 3. This Accusation is brought before the Board of Registered Nursing  
28 (Board), Department of Consumer Affairs, under the authority of the following laws. All section

1 references are to the Business and Professions Code unless otherwise indicated.

2 **STATUTORY PROVISIONS**

3 4. Section 2750 of the Code states, in pertinent part, that the Board may  
4 discipline any licensee, including a licensee holding a temporary or an inactive license, for any  
5 reason provided in Article 3 of the Nursing Practice Act.

6 5. Section 2764 of the Code states:

7 "The lapsing or suspension of a license by operation of law or by order or decision  
8 of the Board or a court of law, or the voluntary suspension of a license by a licentiate shall not  
9 deprive the Board of jurisdiction to proceed with any investigation of or disciplinary proceeding  
10 against such license, or to render a decision suspending or revoking such license."

11 6. Section 2811, subdivision (b), of the Code provides in pertinent part, that  
12 each license not renewed in accordance with that section shall expire, but may within a period of  
13 eight years thereafter be reinstated.

14 7. Section 2761(a)(4) of the Code states, in pertinent part, that the Board may  
15 take disciplinary action against a certified or licensed nurse for unprofessional conduct, which  
16 includes, but is not limited to, denial of licensure, revocation, suspension, restriction, or any other  
17 disciplinary action against a health care professional license or certificate by another state or  
18 territory of the United States, by any other government agency, or by another California health  
19 care professional licensing board. A certified copy of the decision or judgment shall be  
20 conclusive evidence of that action.

21 8. Section 125.3 of the Code states, in pertinent part, that a Board may  
22 request the administrative law judge to direct a licentiate found to have committed a violation or  
23 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation  
24 and enforcement of the case.

25 **FIRST CAUSE FOR DISCIPLINE**

26 (Out-of-State Discipline)

27 9. Respondent is subject to disciplinary action pursuant to section 2761(a)(4)  
28 of the Code on the grounds of unprofessional conduct in that on or about March 13, 2003, in a

1 Consent for Entry of Voluntary Surrender Order, in the Matter of Professional Nurse License No.  
2 RN101495 Issued to: Paige M. Campbell, Respondent, Case No. 011024, the Arizona State  
3 Board of Nursing accepted the surrender of Respondent's license to practice as a professional  
4 nurse in the State of Arizona.. The circumstances surrounding the surrender of Respondent's  
5 license were that Respondent committed misconduct and unprofessional conduct as follows:

6 a. On or about October 18, 2001, Respondent self reported her use of cocaine  
7 to the Arizona Board. Respondent reported that she had been in recovery for ten years prior to  
8 her recent relapse on cocaine.

9 b. On or about October 23, 2001, Respondent entered into treatment at the  
10 Impact Drug and Alcohol Treatment Center in Pasadena, California. On March 6, 2002,  
11 Respondent completed the residential portion of the program and began outpatient treatment on  
12 June 4, 2002. Subsequently, she completed her outpatient treatment.

13 c. On or about December 1, 2001, Respondent signed a Stipulated  
14 Agreement with the Arizona Board's CANDO Program. The agreement required, in part, for  
15 Respondent to enter and complete an intensive treatment program aftercare, attend a nurse  
16 recovery group, attend AA/NA, abstain from unauthorized drug use, notify CANDO of any  
17 prescriptions received, and submit to random urine drug screens.

18 d. Respondent failed to submit any AA/NA attendance reports in violation of  
19 her Stipulated Agreement.

20 e. Respondent failed to submit documentation confirming entry into aftercare  
21 and participation in a nurse recovery group as required by her Stipulated Agreement.

22 f. Respondent failed to submit evidence of her participation in random drug  
23 screening following her completion of out patient treatment.

24 PRAYER

25 WHEREFORE, Complainant requests that a hearing be held on the matters herein  
26 alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

27 1. Revoking or suspending Registered Nurse License No. 582195, issued to  
28 Paige Marie Campbell.



2. Ordering Paige Marie Campbell to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3.

3. Taking such other and further action as deemed necessary and proper.

DATED: 27/04

Ruth Ann Terry  
RUTH ANN TERRY, M.P.H., R.N.  
Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
Complainant